DODD has indicated a willingness to open up the Provider Certification Rule for discussion as part of the Provider Compliance Workgroup established in the last state budget. We have included a list of potential discussion points to assist in thinking about both the broad scope of the rule and the many areas that could be revised. Conceptually, this provides our system an opportunity for a fundamental re-write of a rule that has such sweeping impact on the provision of service in our system.

**Requirements for Agency Provider Certification**

CEO Requirements—Paragraph (D)(1) pg. 4

-Are these too narrow or too broad?

-Do we want to begin to limit the number of new agency providers coming into our system?

Annual CEO Training Requirements—(D)(1)(i) pg. 5

-Are the existing requirements still relevant or are there alternatives that would better enhance ongoing CEO performance?

Agency Requirements (D)(9-16) pgs. 7-8

-Questions or concerns with current requirements?

DSP Requirements (D)(17) pgs. 9-11

-Revisit the 18 yrs of age requirement? Can you think of work scenarios where a younger employee would fit?

-Revisit the high school degree or GED requirement? Same as above.

DSP Training Requirements (D)(17)(g,h,I,j) pgs. 10-11

-Are the training requirements reflective of need? Do the requirements, prior to providing direct service, make the most practical sense or have we learned more effective ways of training?

-Are the continuing education requirements still the most relevant or productive or are their alternatives that would enhance DSP performance?

Standards of Service Provision (F) pg. 13

-Suggest a complete review of this section-what is its purpose, is it still practical?

Procedures for Obtaining Initial Certification (G) pg.14

-Suggest a complete review of this section specific to DODD processes

Procedures for Obtaining Certification to Provide Additional HCBS Services (H) pg.16

-Suggest a complete review of this section specific to DODD processes

Procedure for Obtaining Renewal Certification (I) pgs. 16-18

-Suggest a complete review of this section specific to DODD processes